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18 Attorneys for Defendant

19 **NATIONAL RAILROAD PASSENGER**

20 **CORPORATION dba AMTRAK**

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DOUGLAS SINCLAIR, an individual,

Plaintiff,

v.

NATIONAL RAILROAD
PASSENGER CORPORATION d/b/a
AMTRAK, a corporation; and DOES 1-
20, inclusive,

Defendants.

CASE NO. 1:22-cv-00744-JLT-SKO

**JOINT STIPULATION AND
ORDER TO EXTEND DISCOVERY
DEADLINE FOR NON-EXPERT
DISCOVERY**

(Doc. 20)

Honorable Judge Sheila K. Oberto

1 Plaintiff DOUGLAS SINCLAIR (“Plaintiff”) and Defendant NATIONAL
2 RAILROAD PASSENGER CORPORATION d/b/a AMTRAK (“Defendant”),
3 through their respective counsel of record, hereby stipulate pursuant to Rules 16 and
4 26 of the Federal Rules of Civil Procedure as follows:

5 **1. Good Cause to Extend Discovery Deadline For Non Expert Discovery**

6 The Parties come before the Court to seek a first extension of the discovery
7 deadline for the non-expert discovery from May 31, 2023 to June 30, 2023. All other
8 deadlines will not be affected with such extension. The Parties have engaged in good
9 faith efforts to further discovery in this matter and to resolve a discovery dispute.

10 Plaintiff’s counsel is currently on a medical leave, and Defendant has a dispute
11 with regard to the deposition topics for a deposition scheduled May 24, 2023. Because
12 Plaintiff’s counsel is on medical leave until May 22, the Parties will not be able to
13 resolve the dispute prior to the May 24 deposition. Because of these reasons, the
14 Parties have agreed to extend the deadline to allow time to resolve the dispute and any
15 other discovery issues. As such, the Parties request that the Court for good cause
16 grant the Parties’ first request for an extension of time.

17 **2. Stipulation to Extend Discovery Deadlines**

18 The Parties stipulate that the original Joint Scheduling Order (ECF No. 15) be
19 amended to reflect the following new deadlines:

- 20 a. Non Expert discovery shall be completed by June 30, 2023.
21 b. All remaining discovery deadlines remain the same.

22 IT IS SO STIPULATED.
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1 DATED: May 22, 2023

KIRSCHNER LAW, PC

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3 By: /s/ Ethan D. Kirschner

4 Ethan D. Kirschner

5 Attorney for Plaintiff DOUGLAS
6 SINCLAIR

7 DATED: May 22, 2023

LITTLER MENDELSON, P.C.

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9 By: /s/ Ryan L. Eddings

10 Ryan L. Eddings

11 Attorney for Defendant NATIONAL
12 RAILROAD PASSENGER
13 CORPORATION d/b/a AMTRAK

ORDER

14 For good cause shown (*see* Fed. R. Civ. P. 16(b)(4)), the foregoing stipulation
15 to extend discovery deadline (Doc. 20) is hereby approved and the new deadline for
16 discovery as set forth in the Scheduling Order (Doc. 15) is MODIFIED as follows:
17 Non expert discovery shall be completed by **June 30, 2023**. All remaining
18 deadlines remain as set.

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20 IT IS SO ORDERED.

21 Dated: **May 24, 2023**

/s/ Sheila K. Oberto

22 UNITED STATES MAGISTRATE JUDGE
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